

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JASON MCLEAN and)
BRIAN COLEMAN,)
Plaintiffs,)
v.) Civ. No.: 06-617-SLR
COMMUNICATIONS) JURY TRIAL DEMANDED
CONSTRUCTION GROUP, LLC.,)
Defendant.)

MOTION FOR EXTENSION OF DISCOVERY

1. Pursuant to the requirements of Rule 16.5, the Plaintiffs through undersigned Counsel to the above-referenced matter hereby request that the discovery deadline for the discovery period shall be extended until October 28, 2007.
2. The Defendant's Counsel does not oppose the request.
3. The reasons for the extension are the following:
 - a) Plaintiff's counsel has recently identified the contact information for two important witnesses, Joseph G. Tatsch and Robert Koch who no longer work for the company.
 - b) Neither Plaintiffs nor Defendant had the witnesses contact information.
 - c) Only recently, despite numerous efforts was Plaintiff's Counsel successful in contacting the witnesses.
 - d) Plaintiff's Counsel would like to depose both witnesses to complete the discovery process.

4. The deadline for summary judgment motions is November 28, 2007 and trial date is currently scheduled for March 31, 2008.

5. All remaining deadlines shall remain from the original scheduling order of March 28, 2007.

YOUNG, MALMBERG & HOWARD, P.A.

/s/ Ronald G. Poliquin
Ronald G. Poliquin, Esquire
I.D. No. 4447
30 The Green
Dover, DE 19901
(302) 672-5600
Attorney for Plaintiffs

DATED: September 21, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JASON MCLEAN and)	
BRIAN COLEMAN,)	
)	
Plaintiffs,)	
)	
v.)	Civ. No.: 06-617-SLR
)	
COMMUNICATIONS)	JURY TRIAL DEMANDED
CONSTRUCTION GROUP, LLC.,)	
)	
Defendant.)	

ORDER

AND NOW, it is hereby ORDERED that the above Motion for Extension of
Discovery is approved and entered this _____ day of _____, 2007.

Judge Sue L. Robinson

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JASON MCLEAN and)	
BRIAN COLEMAN,)	
)	
Plaintiffs,)	
)	
v.)	Civ. No.: 06-617-SLR
)	
COMMUNICATIONS)	JURY TRIAL DEMANDED
CONSTRUCTION GROUP, LLC.,)	
)	
Defendant.)	

CERTIFICATE OF MAILING

I certify that on this 21st day of September 2007, I caused to be served one (1) copy of the foregoing Motion for Extension of Discovery on the following parties via United States Mail, postage prepaid:

Michael B. Kelly, Esquire
Daniel M. Silver, Esquire
McCarter & English, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801

Thomas Benjamin Huggett, Esquire
Courtney A. Wirth, Esquire
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103

YOUNG, MALMBERG & HOWARD, P.A.

/s/ Ronald G. Poliquin
Ronald G. Poliquin, Esquire
I.D. No. 4447
30 The Green
Dover, DE 19901
(302) 672-5600
Attorney for Plaintiffs